

EXHIBIT A

September 23, 2021

Page 167		Page 169
1 A. I may have.		1 I had that.
2 Q. Sir, let me ask you, the Confederacy -- we're		2 BY MR. CALLISTE:
3 talking about the Confederacy at this point. Did the		3 Q. Any other songs?
4 Confederacy have a national anthem?		4 A. Well, the anthem -- the songs that both armies
5 MS. FISHER: Objection.		5 sang, so Dixie and Johnny Comes Marching Home Again on
6 BY MR. CALLISTE:		6 the federal side.
7 Q. Mr. Greene?		7 Q. Any others that you can recall?
8 A. I don't sing, but I don't know if Dixie is like		8 A. Bonnie Blue Flag. That's about it.
9 the unofficial anthem. I don't know if that was the		9 Q. Okay. And are those -- those are songs that
10 official.		10 you listened to often?
11 Q. And is the song called Dixie --		11 A. No.
12 MS. FISHER: Objection.		12 MS. FISHER: Objection.
13 BY MR. CALLISTE:		13 BY MR. CALLISTE:
14 Q. -- that you're referring to?		14 Q. Sir, can you tell me under what circumstances
15 A. I think so.		15 it was that you played those songs in the office, Wenig
16 Q. All right. You ever play that song in the		16 Saltiel?
17 Wenig Saltiel office, the Dixie song?		17 A. I didn't listen to music very often in the
18 MS. FISHER: Objection.		18 office. I used the office for work.
19 THE WITNESS: I don't think so.		19 Q. Right. My question was, under what
20 BY MR. CALLISTE:		20 circumstances would you play those songs that you just
21 Q. Sir, when you say you don't think so, do you		21 identified?
22 recall specifically whether you ever played that -- that		22 A. I don't recall.
23 song, Dixie --		23 Q. Okay. Could you tell me, sir, do you recall
24 A. No, I don't --		24 playing any of those songs in the Wenig Saltiel office in
25 MS. FISHER: Objection.		25 2018 or 2019?
Page 168		Page 170
1 THE WITNESS: -- recall if --		1 A. I can't remember.
2 MS. FISHER: You've got to --		2 Q. Okay. You ever have any conversations with
3 BY MR. CALLISTE:		3 Ms. Fernandez about those songs?
4 Q. -- at the Wenig Saltiel office?		4 A. Never.
5 You're both trying to jump on the answer, but I		5 Q. You ever play any of those songs for
6 need to finish my question first.		6 Ms. Fernandez?
7 A. No, I do not.		7 A. Never.
8 Q. Okay. Sir, you ever play any music related to		8 Q. You ever play any of those songs while
9 those events in the Wenig Saltiel office, those		9 Ms. Fernandez was in the vicinity of your office?
10 reenactments in the Wenig --		10 MS. FISHER: Objection.
11 MS. FISHER: Objection.		11 THE WITNESS: Never.
12 BY MR. CALLISTE:		12 BY MR. CALLISTE:
13 Q. -- Saltiel office?		13 Q. Okay. And, sir, when you played these songs in
14 A. Well, I listen to 19th century music from time		14 the office, how would you play these songs? In other
15 to time in the office.		15 words, did you have a device that you accessed that had
16 Q. When you say 19th century music, sir, can you		16 these songs on them, or did you access the internet to
17 tell me the names of any 19th century songs or music that		17 get them? How did you -- how did you go about playing
18 you have played in the office?		18 them?
19 MS. FISHER: Objection.		19 A. Probably through the computer.
20 THE WITNESS: Just popular songs of that era.		20 Q. When you say the computer, meaning the
21 BY MR. CALLISTE:		21 computer -- your desktop --
22 Q. Okay. And can you tell me what songs you've		22 A. Yeah.
23 played from that era in that office?		23 Q. -- computer?
24 MS. FISHER: Objection.		24 A. Yes, the desktop. You know, I take a break, I
25 THE WITNESS: I can remember The Vacant Chair.		25 might listen to something, but ordinarily I -- that would

September 23, 2021

Page 179	Page 181
1 MS. FISHER: Objection.	1 A. I can't tell -- I don't know.
2 THE WITNESS: Yes.	2 Q. You ever get into any disagreements with
3 BY MR. CALLISTE:	3 Ms. Fernandez while you were in the office?
4 Q. What social media sites do you use?	4 A. I don't recall having a disagreement with her.
5 MS. FISHER: Objection. You can answer.	5 Q. Okay. You ever get into any arguments with
6 THE WITNESS: Facebook.	6 Ms. Fernandez in the office?
7 BY MR. CALLISTE:	7 A. I never had an argument with her.
8 Q. All right. Other than Facebook, did you use	8 Q. Ms. Fernandez ever come to you and complain to
9 any other social media sites?	9 you about any of your own conduct, let's say, in that
10 A. That's all.	10 office, in the Wenig Saltiel office?
11 Q. Okay. And, sir, in 2018 did you ever access	11 A. She never complained to me about anything
12 Facebook from the office of Wenig Saltiel or while you	12 personally.
13 were in the office at Wenig Saltiel?	13 Q. Did Ms. Fernandez ever raise any concerns with
14 A. Yeah.	14 you then about any conduct of your conduct in the office?
15 Q. And how often did you do that?	15 A. No.
16 A. Not that often.	16 MR. BINIAKEWITZ: (Inaudible).
17 Q. And how would you access Facebook while you	17 THE COURT REPORTER: Someone is speaking, and I
18 were at the Wenig Saltiel office?	18 can't understand them.
19 A. I used the computer. I wouldn't use the	19 MR. CALLISTE: Yeah.
20 phone --	20 MR. BINIAKEWITZ: Oh, I'm sorry. I was talking
21 Q. Okay.	21 to my daughter. I'm sorry. I thought I was on
22 A. -- I'd use the computer. It's faster.	22 mute.
23 Q. So you would use the computer that was in that	23 BY MR. CALLISTE:
24 office?	24 Q. Sir, with regard to Facebook, do you still use
25 A. Well, not much.	25 Facebook today?
Page 180	Page 182
1 Q. Sir, you would use the computer that was in the	1 MS. FISHER: Objection.
2 office?	2 THE WITNESS: Yes.
3 A. Yes.	3 BY MR. CALLISTE:
4 Q. Okay. And, sir, at any point in time did you	4 Q. And is your Facebook screen name or your
5 ever show Ms. Fernandez anything that you were looking at	5 account name the same name that it was back in 2018,
6 on Facebook?	6 2019?
7 A. No, I never showed her anything.	7 MS. FISHER: Objection.
8 Q. Okay. Did you ever show her anything on your	8 THE WITNESS: I don't know.
9 screen, on the computer screen, that you may have been	9 BY MR. CALLISTE:
10 looking at --	10 Q. Have you ever had multiple screen names or
11 A. No, I did not.	11 screen identities on Facebook?
12 MS. FISHER: Objection.	12 MS. FISHER: Objection.
13 BY MR. CALLISTE:	13 BY MR. CALLISTE:
14 Q. Sir, do you write for blogs or a vlog, vlogs?	14 Q. More than one.
15 MS. FISHER: Objection.	15 A. Not to my recollection.
16 THE WITNESS: No.	16 Q. Okay. As you sit here today, you can't recall
17 BY MR. CALLISTE:	17 what your screen name is?
18 Q. Have you ever written for vlogs?	18 MS. FISHER: Objection.
19 A. No.	19 THE WITNESS: The only name I use is Ira
20 MS. FISHER: Objection.	20 Greene.
21 BY MR. CALLISTE:	21 BY MR. CALLISTE:
22 Q. Sir, the music that you indicated you played	22 Q. Okay. Sir, do you know if Ms. Fernandez --
23 from the office -- or you played in the office every now	23 putting aside -- well, withdrawn.
24 and again, sir, can you tell me if any of that music came	24 Do you know if Ms. Fernandez ever made any
25 from Facebook or from your social media page?	25 complaints about you personally to anyone else at Wenig